IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TAREK MENTOURI,)
Plaintiff,)
v.) Case No. 3:21-cv-00383
PERDOCEO EDUCATION CORPORATION,	Judge William L. Campbell, Jr.
Defendant)

DEFENDANT PERDOCEO EDUCATION CORPORATION'S MOTION TO DISMISS

COMES NOW Defendant Perdoceo Education Corporation ("Perdoceo" or "Defendant"), and, pursuant to Fed. R. Civ. P. 12(b)(6), respectfully moves this Court for entry of an order dismissing Plaintiff Tarek Mentouri's ("Plaintiff") Complaint. In support of this Motion, Perdoceo relies on its accompanying Memorandum of Law in Support of the Motion to Dismiss. For the reasons more fully explained in the Memorandum of Law in Support of the Motion to Dismiss, Plaintiff's Complaint contains no factual allegations in support its claim that Perdoceo violated the TCPA and is therefore due to be dismissed because it fails to state a claim upon which relief can be granted.

Respectfully submitted this 19th day of May, 2021.

/s/ Samuel A. Morris

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Attorney for Defendant

PERDOCEO EDUCATION CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded by electronic means via the Court's CM/ECF system and/or by first-class, United States mail, postage prepaid, on this the 19th day of May, 2021:

Tarek Mentouri 1801 Glade Street Nashville, TN 37207

<u>/s/ Samuel A. Morris</u>

Samuel A. Morris, Esq.